



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CK/LXN
F.#2010R01079

271 Cadman Plaza East
Brooklyn, New York 11201

January 19, 2012

By ECF & Hand

John Nicolas Iannuzzi, Esq.
Law Offices of Iannuzzi and Iannuzzi
74 Trinity Place
New York, New York 10006

Re: United States v. Chang
Criminal Docket No. 11-0067 (SJ)

Dear Mr. Iannuzzi:

Enclosed please find four CDs containing the government's continued discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government hereby also requests reciprocal discovery.

The materials include:

(1) Three CDs containing documents previously produced to the defendant on February 28, 2011 as "Disks 1, 2 and 3." The documents bear bates numbers 1-115490.

(2) One CD containing the following documents:

(a) American Express bank records bearing bates numbers 121306-121402;

(b) Asia Bank records bearing bates numbers 121403-122401;

(c) A report of an interview of the defendant on December 14, 2009, which was previously produced to the defendant on February 28, 2011. The report is bates numbered 122402-122406;

(d) Additional statements of the defendant, bates numbered 125467-125496.

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
Charles Kleinberg
Lan Nguyen
Assistant U.S. Attorneys
(718) 254-6012/6162

Enclosures

CC: Clerk of Court (SJ) (w/o enclosures)